HZ/RC/TE

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: Firestone Polymers Orange Plant
Facility Address: 5713 FM 1006, Orange, Texas
Facility EPA ID #: TXD008073538
TCEQ SWR ID #: 30581

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

X If yes - check here and continue with #2 below.

_____ If no - re-evaluate existing data, or

_____ if data are not available skip to #6 and enter"IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater	X	___	___	VOCs exceed MSCs
Air (indoors)[2]	___	___	___	
Surface Soil (e.g., <2 ft)	X	___	___	SVOCs and Metals exceed MSCs
Surface Water	___	___	___	
Sediment	___	___	___	
Subsurf. Soil (e.g., >2 ft)	X	___	___	VOCs, SVOCs and Metals exceed MSCs
Air (outdoors)	___	___	___	

_____ If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

X If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

_____ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s): **Groundwater** - VOC concentrations exceed GW MSCs in shallow groundwater in the immediate area of Units TX09 (landfill), TX02 (landfill), and TX34/F49 (equalization basin/titled plate separator) (Environmental Site Assessment Report, December 10, 1998 and Initial LTM Program Status Report, June 2006). **Soil** – VOCs, SVOCs, and metals exceed GWP MSCs in surface and/or subsurface soil, but none of the chemicals have been detected in permanent monitor wells at concentrations exceeding GW MSCs. Nickel, benzo(a)pyrene, benzo(b)fluoranthene, indeno(1,2,3-cd)pyrene exceed site specific SAI MSCs at one or more of the Units TX04 (landfill), TX07 (surface impoundment), TX18 (aboveground storage tank F-401), and F37/F48 (landfill/API Separator).

Footnotes:

[1] "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

[2] Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

	Potential **Human Receptors** (Under Current Conditions)						
"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food[3]
Groundwater	___	___	___	No	___	___	___
Air (indoors)	___	___	___	___	___	___	___
Soil (surface, e.g., <2 ft)	___	No	___	No	___	___	___
Surface Water	___	___	___	___	___	___	___
Sediment	___	___	___	___	___	___	___
Soil (subsurface e.g., >2 ft)	___	___	___	No	___	___	___
Air (outdoors)	___	___	___	___	___	___	___

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated") as identified in #2 above.

2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

X If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

_____ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale and Reference(s): Exposure to contaminants for the above pathways is not reasonably expected to occur under the current conditions because: 1) the contaminated shallow groundwater is very limited in areal extent, located in an inactive area of the plant, and not used for any purpose; 2) the contaminated soil exceeding SAI MSCs is limited in areal extent; 3) Any potential site worker exposure would be minimized through the facilities OSHA program; and 4) plant is gated and staffed to limit access.

[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

4 Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):_____

[4] If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

5 Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

_____ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

_____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s):_____

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

X YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Firestone Polymers Orange Plant, EPA ID # TXD008073538, located at 5713 FM 1006, Orange, Texas under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

____ NO - "Current Human Exposures" are NOT "Under Control."

____ IN - More information is needed to make a determination.

Completed by: Mark Arthur Date: 8/16/2007
Project Manager, Team II, Environmental Cleanup Section I

Supervisor: Ada Lichaa Date: 8/16/2007
Team Leader, Team II, Environmental Cleanup Section I
Texas Commission on Environmental Quality

Locations where References may be found:

TCEQ Central Records, Austin, TX

Contact telephone and e-mail numbers:

Project Manager listed above
(512) 239-2200
marthur@tceq.state.tx.us

Final Note: The purpose of the Human Exposures EI is to qualitatively screen exposures based on current land and groundwater use. A "YE" determination does not constitute a screening tool that ends the corrective action process. The "YE" determination may be changed at any time as new information becomes available.

DEC 22 1998

Mr. Thomas F. Myers
Jones Jain
1110 Vermont Avenue, N.W., Suite 1150
Washington, D.C. 20005

Dear Mr. Myers:

This is in response to your Freedom of Information request which we have numbered (6)RIN-00275-99 dated December 2, 1998, regarding Firestone Synthetic Rubber and Latex Company located in Orange, Texas. The information that you requested is enclosed.

The Environmental Protection Agency has authorized the States located in Region 6 to operate the Resource Conservation and Recovery Act (RCRA) program. Additional information may be available from records maintained by the Texas Natural Resource Conservation Commission, P.O. Box 13087, Austin, TX 78711-3087. You may also receive direct replies from other Region 6 Program Offices.

Should you have any questions concerning your request, please contact Ms. Kerri Gurmendi at (214) 665-7393. You will receive a final billing from the Freedom of Information Officer.

Sincerely yours,

CJKaleri

for William Gallagher, Chief
RCRA OK/TX Permits Section (6PD-O)

Enclosure

6PD-O
GURMENDI

Computer J: 6PD-O/rin275.wpd:12/17/98

bcc: Jerva Durham, 6M-AI
Annette Gersh, 6PD-I

SUMMARY SCORING REPORT

FACILITY NAME : FIRESTONE SYNTHETIC RUBBER & LATEX COMPANY
EPA ID : TXD008073538
LOCATION : FARM ROAD 1006
ORANGE, ORANGE, TX 77630
Modified on : 09/11/98

INDIVIDUAL UNIT MIGRATION SCORE

Unit Name	GW Score	SW Score	Air Score	On-Site Score	Total
API SEPARATOR	308.30*	366.67*	239.32	154.07*	278.62
STORMWATER DITCHES	154.15	45.83	62.68	77.04*	94.51
SURFACE IMPOUNDMENT (TX01)	308.30*	183.33*	182.34	154.07*	215.43
LANDFILL (TX02)	154.15*	91.67*	81.67	77.04*	105.79
SURFACE IMPOUNDMENT (TX05)	308.30*	183.33*	106.36	154.07*	202.31

OVERALL FACILITY MIGRATION SCORE

1233.20	870.83	672.37	616.30	896.66

FACILITY RCRA R6 CAPS SCORE

RFI Units and AOC Score : 100

TOTAL RCRA R6 CAPS SCORE : 906.05

COMMENTS:

NOTES: * = Observed release to media. Score of "-1" = missing data

		BRIDGESTONE /FIRESTONE INC.	INVESTIGATION; APPENDICES A THROUGH J ORANGE, TEXAS 1/92
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 017 REPORT 1992 VOLUME II (2 OF 2) 1991-SUPPLEMENTAL INVESTIGATION; APPENDICES A THROUGH J ORANGE, TEXAS 1/92
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 018 REPORT 1996 PRELIMINARY RISK-BASED SITE EVALUATION REPORT 5/96
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 019 REPORT 1996 SITE INVESTIGATION REPORT VOL 1 OF 2 5/96
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 020 REPORT 1996 SITE INVESTIGATION REPORT VOL 2 OF 2 5/96
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 021 REPORT 1991 SUPPLEMENTAL INVESTIGATION VOLUME 1 BRIDGESTONE FIRESTONE, INC FIRESTONE SYNTHETIC RUBBER AND LATEX COMPANY
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 022 REPORT 1997 ENVIRONMENTAL SITE ASSESSMENT WORKPLAN PART 1 OF 2 7/97
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 023 REPORT 1997 ENVIRONMENTAL SITE ASSESSMENT WORKPLAN PART 2 OF 2 7/97
EOR			
EOR			

INFO. TYPE	DEPARTMENT	RECORD SERIES ID & TITLE	INFORMATION ID & TITLE
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-CO VOL: 001 CORRESPONDENCE 1986 - 1990
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-CO VOL: 002 CORRESPONDENCE 1991 - 1993
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-CO VOL: 003 CORRESPONDENCE 1994 -
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-IN VOL: 001 INSPECTION REPORTS 1985 -
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-MA VOL: 001 MAPS/PHOTOS
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 001 REPORT 1985 SITE ASSESSMENT 8/85
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 002 REPORT 1991 REMEDIATION COMPLETION REPORT FOR AREA 20C 9/91
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 003 REPORT 1994 HAZARDOUS WASTE MANIFEST COMPLETION PLAN 4/91
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 004 REPORT 1994 SOIL AND GROUNDWATER PHASE IA ASSESSMENT WORK PLAN 6/94
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 005 REPORT 1994 ENVIRONMENTALL RECEPTORS ASSESSMENT PLAN 7/94

906.05

9-10-98

INFO. TYPE	DEPARTMENT	RECORD SERIES ID & TITLE	INFORMATION ID & TITLE
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 006 REPORT 1994 CLOSURE CERTIFICATION OF TANK F-1106 9/94
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 007 REPORT 1992 HEALTH RISK ASSESSMENT VOL 1 1/92
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 008 REPORT 1992 HEALTH RISK ASSESSMENT VOL 2 1/92
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 009 REPORT 1990 DATA REPORT - FISH AND SEDIMENTS 11/90
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 010 REPORT 1990 ANALYTICAL DATA ENSR CONSULTING AND ENGINEERING 8/10
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 011 REPORT 1991 SITE ASSESSMENT UPDATE VOL 1 1/91
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 012 REPORT 1991 SITE ASSESSMENT UPDATE VOL 2 1/91
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 013 REPORT 1991 HEALTH AND SAFETY PLAN FOR AREA 20C REMEDIATIO ORANGE, TEXAS 2/91
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 014 REPORT 1992 VOLUME III (1 OF 2) 1991-SUPPLEMENTAL INVESTIGATION ORANGE, TEXAS 1/92
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE BRIDGESTONE /FIRESTONE INC.	ISW -000030581-RP VOL: 015 REPORT 1992 VOLUME III (2 OF 2) 1991-SUPPLEMENTAL INVESTIGATION ORANGE, TEXAS 1/92

INFO. TYPE	DEPARTMENT	RECORD SERIES ID & TITLE	INFORMATION ID & TITLE
FILE	IHW	ISW -000030581 INDUSTRIAL SOLID WASTE	ISW -000030581-RP VOL: 016 REPORT 1992 VOLUME II (1 OF 2) 1991-SUPPLEMENTAL

TNRCC

U.S. EPA - REGION VI
RCRA CORRECTIVE ACTION PRIORITIZATION SYSTEM (RCRA CAPS)

DATA ENTRY WORK SHEETS

SCORE: 906.05

8-18-98

Scored By : Tina Alvarado

Organization : TechLaw

Date : October 22, 1997

U.S. EPA - REGION VI
RCRA CORRECTIVE ACTION PRIORITIZATION SYSTEM (RCRA CAPS)

TABLE A-1
FACILITY GENERAL INFORMATION - DATA ENTRY
Sheet 1 of 2

A-1. Facility ID No. : TXD008073538

A-2. Facility Name : Firestone Synthetic Rubber + Latex Co

A-3. Street Address : Farm Road 1006

City : Orange State: TX Zip: 77630

County : Orange

Latitude : 30 02 · 58 " Longitude: 93 47 · 11 "

A-4. Facility Type (Primary Business) : production of synthetic rubber

A-5. Year Started: 1956 A-6. Hazardous Waste Site Size : 336 (acres)

A-7. Commercial Hazardous Waste Facility? (Yes/No) : No

A-8. Receives Wastes Generated Off-Site? (Yes/No) : No

A-9. Receives Wastes Generated On-Site? (Yes/No) : Yes

A-10. Have There Been Any Public Complaints? (Yes/No) : No

U.S. EPA - REGION VI
RCRA CORRECTIVE ACTION PRIORITIZATION SYSTEM (RCRA CAPS)

TABLE A-1

FACILITY GENERAL INFORMATION - DATA ENTRY

Sheet 2 of 2

A-11. Enforcement Actions:

	Dates:	By:	Description:
1.	4/6/94	TNRCC	Agreed Order / Enforcement
2.	1/14/93	State	NOV - evidence of spills dr. order during insp
3.			

A-12. Environmental Permits:
(RCRA, NPDES, or other)

1. NPDES
2.
3. TWC
4.
5. TACB (6)
6.

A-13. Resources Used for Scoring:

Source	(Yes/No)	Date:
RFA:		
PA:		
Part B:		
Part A:	Yes	1980

Other (name): See Notes Date:

A-14. Total Number of SWMUs and AOCs: 49

A-15. Total Number of RCRA Land Disposal Units: at least 4

A-16. Comments :

TABLE A-2

FACILITY SCORING INFORMATION - COMMOM INFORMATION - DATA ENTRY

Sheet 1 of 2

A-17. Is the facility less than 500 acres?: (i.e. less than 1/2-mile radius) — Yes

A-18. Total number of SWMUs and AOC for RFI: — at least 5

A-19. Number of SWMUs Score: — 5

A-20. Mean Annual Temperature (°F): (If unknown, use database) — 67°F

A-21. Net Precipitation: (select one) — 3

1 = < -10 inches
2 = -10 to 5 inches
3 = >5 to 15 inches
4 = >15 inches

A-22. Annual Precipitation (inches): (if unknown, use database) — 59.20 ~~7.82~~

A-23. 100-Year 24-hour rainfall: (if unknown, use database) — 2

1 = <5 inches
2 = 5 to 10 inches
3 = >10 to 15 inches
4 = >15 inches

A-24. Depth to Aquifer: (select one) — 1

1 = 0 to 10 feet
2 = >10 to 75 feet
3 = >75 to 150 feet
4 = >150 feet

TABLE A-2

FACILITY SCORING INFORMATION - COMMON INFORMATION - DATA ENTRY
Sheet 2 of 2

A-25. Sole Source Aquifer (Yes/No):
(if unknown, use database) No

A-26. Geologic Material Above Aquifer:
(If depth to aquifer is <10 feet, assign 4.) 4

(Select lowest possible value.)

1 = Hydraulic conductivity $<10^{-7}$ cm/sec ($<1.4 \times 10^{-3}$ inches/hour)
Clay; low-permeability till (compact, unfractured till); shale; unfractured metamorphic and igneous rocks

2 = Hydraulic conductivity = 10^{-5} to 10^{-7} cm/sec. (1.4×10^{-1} to 1.4×10^{-3} inches/hour)
Silt; loesses; silty clays; sediments that are predominantly silts; moderately-permeable till (fine-grained, unconsolidated till, or compact till with some fractures); low-permeability limestones and dolomites (no karst); low-permeability sandstone; low-permeability fractured igneous and metamorphic rocks

3 = Hydraulic conductivity = 10^{-3} to 10^{-5} cm/sec. (14.7 to 1.4×10^{-1} inches/hour)
Sands; sandy silts; sediments that are predominantly sand; highly-permeable till (coarse-grained, unconsolidated, or compact and highly fractured); peat; moderately-permeable limestone and dolomites (no karst); moderately-permeable sandstone; moderately-permeable fractured igneous and metamorphic rocks

4 = Hydraulic conductivity > 10^{-3} cm/sec. (>14.7 inches/hour)
Gravel; clean sand; highly-permeable fractured igneous and metamorphic rocks; permeable basalt; karst limestones and dolomites

A-27. Ground-water use: 2
(Select lowest possible value.)

1 = Drinking

2 = Possible Drinking

3 = Agriculture or Livestock

4 = Commercial Food Preparation

5 = Commercial or Industrial Use (other than food preparation)

6 = Usable but not used

7 = Unusable

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 1 of 5

A-28. Name of SWMU: API Separator

A-29. SWMU Type: 2
(Select one that best fits the description.)

1 = Surface impoundment, landfarm, land treatment, open tanks, chemical waste pile
2 = Landfill, aboveground containers, closed tanks, contaminated soil, burn pit
3 = Below-ground tanks, buried containers
4 = Trash pile
5 = Others

A-30. Waste Quantity: 3
(Select one.)

1 = <10 cu yds or tons; <40 drums; <2,000 gallons; or <15 sq yds
2 = >10 to 100 cu yds or tons; >40 to 400 drums; >2,000 to 20,000 gallons; or >15 to 150 sq yds
3 = >100 to 1,000 cu yds or tons; >400 to 4,000 drums; >20,000 to 200,000 gallons; or >150 to 1,500 sq yds
4 = >1,000 cu yds or tons; >4,000 drums; >200,000 gallons; or >1,500 sq yds

A-31. Is there an observed release to ground water? (Yes/No/Possible): Yes

A-32. Is there an observed release to surface water? (Yes/No/Possible): Yes

A-33. Is there an observed release to air? (Yes/No/Possible): Possible

A-34. Is there an observed on-site soil contamination? (Yes/No/Possible): Yes

A-35. Chemicals in the above waste (maximum of five chemicals)

1. Petroleum hydrocarbons
2. butadiene
3. Cr
4. Cu
5. Ni

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 2 of 5

A-28. Name of SWMU Unit: API Seperator

A-36. Containment

a.	Are there free liquids in the waste? (Yes/No):	Yes
b.	Does the unit have a liner, impervious base, or secondary containment? (Yes/No)	Yes
c.	Is there a vegetative or semipermeable (including indoors) cover over the waste? (Yes/No)	No
d.	Does the unit have a leachate, spill, or leak collection and removal system? (Yes/No)	Yes
e.	Is there a run-on/run-off control system? (Yes/No)	Yes
f.	Is there an impermeable cover around the waste? (Yes/No)	No
g.	Is there a gas and particulate collection system? (Yes/No)	No

A-37. Flood Frequency:
(Select one.)

assumption 3

1 = SWMU area floods annually
2 = SWMU area in 100 year floodplain
3 = SWMU area not in floodplain

A-38. Upgradient Drainage area:
(on-site and off-site)

2

1 = <50 acres
2 = 50 to 500 acres
3 = >500 acres

A-39. Predominant Land Use Within the Drainage Area:
(Select one.)

3

1 = Residential or Industrial
2 = Cultivated land
3 = Pasture, Range land, Parks (with good grass cover)
4 = Woods and Forests

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 3 of 5

A-28. Name of SWMU: API Separator

A-40. Accessibility to the SWMU area: (for off-site population) ____

1 = Inaccessible
2 = Limited access
3 = Unlimited access

THE QUESTIONS A-41 TO A-50 SHOULD BE ANSWERED FOR EACH SWMU UNIT IF THE FACILITY IS LARGE (GREATER THAN 500 ACRES). FOR SMALL FACILITIES, ANSWER THE FOLLOWING QUESTIONS ONLY ONCE.

A-41. Distance to nearest active drinking water well: (Select one.) 1

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 3 miles
4 = >3 miles

A-42. Distance to Surface Water: (Select one.) 2

1 = <1/4 mile
2 = 1/4 to 1 mile
3 = >1 to 2 miles
4 = >2 miles

A-43. Distance to nearest surface water intake or contact point: (Select one.) 1

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 2 miles
4 = >2 to 3 miles
5 = >3 miles

A-44. Surface water use within 3 miles: (Select lowest possible number.) 5

1 = Drinking
2 = Fishery
3 = Agriculture or Livestock
4 = Commercial Food Preparation
5 = Recreational
6 = Commercial or Industrial (other than food preparation)
7 = Not used or unusable

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 4 of 5

A-28. Name of SWMU Unit: ALL SWMUS

A-45. Surrounding land use: 1
(Select lowest possible number.)

1 = Residential
2 = Commercial or Industrial or Institutional
3 = Agriculture or Ranch
4 = Parks
5 = Forests

A-46. Off-site population within 1-mile radius: 2
(Select one.)

1 = 0
2 = 1 to 100
3 = 101 to 1,000
4 = 1,001 to 3,000
5 = 3,001 to 10,000
6 = 10,001 to 25,000
7 = >25,000

A-47. Off-site population within 3-mile radius: 4
(Select one.)

1 = 0
2 = 1 to 100
3 = 101 to 1,000
4 = 1,001 to 3,000
5 = 3,001 to 10,000
6 = 10,001 to 25,000
7 = >25,000

A-48. Sensitive environment within 1-mile radius: 2
(Select lowest possible number.)

1 = Habitat for endangered or threatened species; marine sanctuary; national park; wilderness area; national recreational area
2 = Habitat known to be used by endangered or threatened species; national preserve; wetlands; wildlife refuge; coastal barrier; river systems critical for maintenance of fish species
3 = Scenic or wild river; designated wildlife or game management; designated areas for protection or maintenance of aquatic life
4 = None

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 5 of 5

A-28. Name of SWMU Unit: All SWMUs

A-49. Sensitive environment within 3-mile radius: 2
(Select lowest possible number.)

1 = Habitat for endangered or threatened species; marine sanctuary; national park; wilderness area; national recreational area
2 = Habitat known to be used by endangered or threatened species; national preserve: wetlands; wildlife refuge; coastal barrier; river systems critical for maintenance of fish species
3 = Scenic or wild river; designated wildlife or game management; designated areas for protection or maintenance of aquatic life
4 = None

A-50. Distance to nearest sensitive environment of off-site population: 1
(Select one.)

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 3 miles
4 = >3 miles

U.S. EPA - REGION VI
RCRA CORRECTIVE ACTION PRIORITIZATION SYSTEM (RCRA CAPS)

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 1 of 5

A-28. Name of SWMU: Stormwater Ditches (F38, F40, F41, and F44) Marshy Area Between The Ditches (F39 F45)

A-29. SWMU Type: 5
(Select one that best fits the description.)

1 = Surface impoundment, landfarm, land treatment, open tanks, chemical waste pile
2 = Landfill, aboveground containers, closed tanks, contaminated soil, burn pit
3 = Below-ground tanks, buried containers
4 = Trash pile
5 = Others

A-30. Waste Quantity: 2 estimation
(Select one.)

1 = <10 cu yds or tons; <40 drums; <2,000 gallons; or <15 sq yds
2 = >10 to 100 cu yds or tons; >40 to 400 drums; >2,000 to 20,000 gallons; or >15 to 150 sq yds
3 = >100 to 1,000 cu yds or tons; >400 to 4,000 drums; >20,000 to 200,000 gallons; or >150 to 1,500 sq yds
4 = >1,000 cu yds or tons; >4,000 drums; >200,000 gallons; or >1,500 sq yds

A-31. Is there an observed release to ground water? (Yes/No/Possible): Possible

A-32. Is there an observed release to surface water? (Yes/No/Possible): Possible

A-33. Is there an observed release to air? (Yes/No/Possible): Possible

A-34. Is there an observed on-site soil contamination? (Yes/No/Possible): Yes

A-35. Chemicals in the above waste (maximum of five chemicals)

1. Hg
2. Hydrocarbons
3. Metals
4.
5.

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 2 of 5

A-28. Name of SWMU/Unit: Stormwater Ditches & Marshy Area

A-36. Containment

a.	Are there free liquids in the waste? (Yes/No):	Yes
b.	Does the unit have a liner, impervious base, or secondary containment? (Yes/No)	No
c.	Is there a vegetative or semipermeable (including indoors) cover over the waste? (Yes/No)	No
d.	Does the unit have a leachate, spill, or leak collection and removal system? (Yes/No)	N
e.	Is there a run-on/run-off control system? (Yes/No)	No
f.	Is there an impermeable cover around the waste? (Yes/No)	No
g.	Is there a gas and particulate collection system? (Yes/No)	No

A-37. Flood Frequency: 3
(Select one.)

1 = SWMU area floods annually
2 = SWMU area in 100 year floodplain
3 = SWMU area not in floodplain

A-38. Upgradient Drainage area: 2
(on-site and off-site)

1 = <50 acres
2 = 50 to 500 acres
3 = >500 acres

A-39. Predominant Land Use Within the Drainage Area: 3
(Select one.)

1 = Residential or Industrial
2 = Cultivated land
3 = Pasture, Range land, Parks (with good grass cover)
4 = Woods and Forests

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 3 of 5

A-28. Name of SWMU: Stormwater Ditches & Marshy Area

A-40. Accessibility to the SWMU area:
(for off-site population)

1 = Inaccessible
2 = Limited access
3 = Unlimited access

THE QUESTIONS A-41 TO A-50 SHOULD BE ANSWERED FOR EACH SWMU UNIT IF THE FACILITY IS LARGE (GREATER THAN 500 ACRES). FOR SMALL FACILITIES, ANSWER THE FOLLOWING QUESTIONS ONLY ONCE.

A-41. Distance to nearest active drinking water well:
(Select one.)

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 3 miles
4 = >3 miles

A-42. Distance to Surface Water:
(Select one.)

1 = <1/4 mile
2 = 1/4 to 1 mile
3 = >1 to 2 miles
4 = >2 miles

A-43. Distance to nearest surface water intake or contact point:
(Select one.)

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 2 miles
4 = >2 to 3 miles
5 = >3 miles

A-44. Surface water use within 3 miles:
(Select lowest possible number.)

1 = Drinking
2 = Fishery
3 = Agriculture or Livestock
4 = Commercial Food Preparation
5 = Recreational
6 = Commercial or Industrial (other than food preparation)
7 = Not used or unusable

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 1 of 5

A-28. Name of SWMU: Surface Impoundments (TX01) *

A-29. SWMU Type: 1
(Select one that best fits the description.)

1 = Surface impoundment, landfarm, land treatment, open tanks, chemical waste pile
2 = Landfill, aboveground containers, closed tanks, contaminated soil, burn pit
3 = Below-ground tanks, buried containers
4 = Trash pile
5 = Others

A-30. Waste Quantity: 3
(Select one.)

1 = <10 cu yds or tons; <40 drums; <2,000 gallons; or <15 sq yds
2 = >10 to 100 cu yds or tons; >40 to 400 drums; >2,000 to 20,000 gallons; or >15 to 150 sq yds
3 = >100 to 1,000 cu yds or tons; >400 to 4,000 drums; >20,000 to 200,000 gallons; or >150 to 1,500 sq yds
4 = >1,000 cu yds or tons; >4,000 drums; >200,000 gallons; or >1,500 sq yds

A-31. Is there an observed release to ground water? (Yes/No/Possible): Yes

A-32. Is there an observed release to surface water? (Yes/No/Possible): Yes

A-33. Is there an observed release to air? (Yes/No/Possible): Possible

A-34. Is there an observed on-site soil contamination? (Yes/No/Possible): Yes

A-35. Chemicals in the above waste (maximum of five chemicals)

1. DCE
2. Benzene
3. PAHs
4. Toluene
5. Ethylbenzene

* = Info. obtained from 1991 Report.

[illegible]

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 2 of 5

A-28. Name of SWMU/Unit: Surface Impoundments

A-36. Containment

a.	Are there free liquids in the waste? (Yes/No):	Yes
b.	Does the unit have a liner, impervious base, or secondary containment? (Yes/No)	No
c.	Is there a vegetative or semipermeable (including indoors) cover over the waste? (Yes/No)	Yes
d.	Does the unit have a leachate, spill, or leak collection and removal system? (Yes/No)	No
e.	Is there a run-on/run-off control system? (Yes/No)	Yes
f.	Is there an impermeable cover around the waste? (Yes/No)	No
g.	Is there a gas and particulate collection system? (Yes/No)	No

A-37. Flood Frequency: (Select one.) 3

1 = SWMU area floods annually
2 = SWMU area in 100 year floodplain
3 = SWMU area not in floodplain

A-38. Upgradient Drainage area: (on-site and off-site) 2

1 = <50 acres
2 = 50 to 500 acres
3 = >500 acres

A-39. Predominant Land Use Within the Drainage Area: (Select one.) 3

1 = Residential or Industrial
2 = Cultivated land
3 = Pasture, Range land, Parks (with good grass cover)
4 = Woods and Forests

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 3 of 5

A-28. Name of SWMU: Surface Impoundments

A-40. Accessibility to the SWMU area: _____
(for off-site population)

1 = Inaccessible
2 = Limited access
3 = Unlimited access

THE QUESTIONS A-41 TO A-50 SHOULD BE ANSWERED FOR EACH SWMU UNIT IF THE FACILITY IS LARGE (GREATER THAN 500 ACRES). FOR SMALL FACILITIES, ANSWER THE FOLLOWING QUESTIONS ONLY ONCE.

A-41. Distance to nearest active drinking water well: _____
(Select one.)

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 3 miles
4 = >3 miles

A-42. Distance to Surface Water: _____
(Select one.)

1 = <1/4 mile
2 = 1/4 to 1 mile
3 = >1 to 2 miles
4 = >2 miles

A-43. Distance to nearest surface water intake or contact point: _____
(Select one.)

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 2 miles
4 = >2 to 3 miles
5 = >3 miles

A-44. Surface water use within 3 miles: _____
(Select lowest possible number.)

1 = Drinking
2 = Fishery
3 = Agriculture or Livestock
4 = Commercial Food Preparation
5 = Recreational
6 = Commercial or Industrial (other than food preparation)
7 = Not used or unusable

U.S. EPA - REGION VI
RCRA CORRECTIVE ACTION PRIORITIZATION SYSTEM (RCRA CAPS)

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 1 of 5

A-28. Name of SWMU: Landfill (TX02)

A-29. SWMU Type: 2
(Select one that best fits the description.)

1 = Surface impoundment, landfarm, land treatment, open tanks, chemical waste pile
2 = Landfill, aboveground containers, closed tanks, contaminated soil, burn pit
3 = Below-ground tanks, buried containers
4 = Trash pile
5 = Others

A-30. Waste Quantity: 2 assumption
(Select one.)

1 = <10 cu yds or tons; <40 drums; <2,000 gallons; or <15 sq yds
2 = >10 to 100 cu yds or tons; >40 to 400 drums; >2,000 to 20,000 gallons; or >15 to 150 sq yds
3 = >100 to 1,000 cu yds or tons; >400 to 4,000 drums; >20,000 to 200,000 gallons; or >150 to 1,500 sq yds
4 = >1,000 cu yds or tons; >4,000 drums; >200,000 gallons; or >1,500 sq yds

A-31. Is there an observed release to ground water? (Yes/No/Possible): Yes

A-32. Is there an observed release to surface water? (Yes/No/Possible): Yes

A-33. Is there an observed release to air? (Yes/No/Possible): Possible

A-34. Is there an observed on-site soil contamination? (Yes/No/Possible): Yes

A-35. Chemicals in the above waste (maximum of five chemicals)

1. Benzene
2. MEK
3. Ethyl Benzene
4. Cr
5. Pb

(PolyButadiene polymers)

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 2 of 5

A-28. Name of SWMU-Unit: Landfill (TX02)

A-36. Containment

a.	Are there free liquids in the waste? (Yes/No):	No
b.	Does the unit have a liner, impervious base, or secondary containment? (Yes/No)	No
c.	Is there a vegetative or semipermeable (including indoors) cover over the waste? (Yes/No)	Yes
d.	Does the unit have a leachate, spill, or leak collection and removal system? (Yes/No)	No
e.	Is there a run-on/run-off control system? (Yes/No)	No
f.	Is there an impermeable cover around the waste? (Yes/No)	No
g.	Is there a gas and particulate collection system? (Yes/No)	No

A-37. Flood Frequency: 3
(Select one.)

1 = SWMU area floods annually
2 = SWMU area in 100 year floodplain
3 = SWMU area not in floodplain

A-38. Upgradient Drainage area: 2
(on-site and off-site)

1 = <50 acres
2 = 50 to 500 acres
3 = >500 acres

A-39. Predominant Land Use Within the Drainage Area: 3
(Select one.)

1 = Residential or Industrial
2 = Cultivated land
3 = Pasture, Range land, Parks (with good grass cover)
4 = Woods and Forests

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 3 of 5

A-28. Name of SWMU: Landfill (TX02)

A-40. Accessibility to the SWMU area:
(for off-site population)

1 = Inaccessible
2 = Limited access
3 = Unlimited access

THE QUESTIONS A-41 TO A-50 SHOULD BE ANSWERED FOR EACH SWMU UNIT IF THE FACILITY IS LARGE (GREATER THAN 500 ACRES). FOR SMALL FACILITIES, ANSWER THE FOLLOWING QUESTIONS ONLY ONCE.

A-41. Distance to nearest active drinking water well:
(Select one.)

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 3 miles
4 = >3 miles

A-42. Distance to Surface Water:
(Select one.)

1 = <1/4 mile
2 = 1/4 to 1 mile
3 = >1 to 2 miles
4 = >2 miles

A-43. Distance to nearest surface water intake or contact point:
(Select one.)

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 2 miles
4 = >2 to 3 miles
5 = >3 miles

A-44. Surface water use within 3 miles:
(Select lowest possible number.)

1 = Drinking
2 = Fishery
3 = Agriculture or Livestock
4 = Commercial Food Preparation
5 = Recreational
6 = Commercial or Industrial (other than food preparation)
7 = Not used or unusable

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 1 of 5

A-28. Name of SWMU: Surface Impoundment (TX05)

A-29. SWMU Type: 1
(Select one that best fits the description.)

1 = Surface impoundment, landfarm, land treatment, open tanks, chemical waste pile
2 = Landfill, aboveground containers, closed tanks, contaminated soil, burn pit
3 = Below-ground tanks, buried containers
4 = Trash pile
5 = Others

A-30. Waste Quantity: 3
(Select one.)

1 = <10 cu yds or tons; <40 drums; <2,000 gallons; or <15 sq yds
2 = >10 to 100 cu yds or tons; >40 to 400 drums; >2,000 to 20,000 gallons; or >15 to 150 sq yds
3 = >100 to 1,000 cu yds or tons; >400 to 4,000 drums; >20,000 to 200,000 gallons; or >150 to 1,500 sq yds
4 = >1,000 cu yds or tons; >4,000 drums; >200,000 gallons; or >1,500 sq yds

A-31. Is there an observed release to ground water? (Yes/No/Possible): Yes

A-32. Is there an observed release to surface water? (Yes/No/Possible): Yes

A-33. Is there an observed release to air? (Yes/No/Possible): Possible

A-34. Is there an observed on-site soil contamination? (Yes/No/Possible): Yes

A-35. Chemicals in the above waste (maximum of five chemicals)

1. MEK
2. Benzoic Acid
3. Benzene
4. Phenol
5. Toluene

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 2 of 5

A-28. Name of SWMU-Unit: Surface Impoundment (+X05)

A-36. Containment

a.	Are there free liquids in the waste? (Yes/No):	Yes
b.	Does the unit have a liner, impervious base, or secondary containment? (Yes/No)	No
c.	Is there a vegetative or semipermeable (including indoors) cover over the waste? (Yes/No)	No
d.	Does the unit have a leachate, spill, or leak collection and removal system? (Yes/No)	No
e.	Is there a run-on/run-off control system? (Yes/No)	Yes
f.	Is there an impermeable cover around the waste? (Yes/No)	Yes
g.	Is there a gas and particulate collection system? (Yes/No)	No

A-37. Flood Frequency: 3
(Select one.)

1 = SWMU area floods annually
2 = SWMU area in 100 year floodplain
3 = SWMU area not in floodplain

A-38. Upgradient Drainage area: 2
(on-site and off-site)

1 = <50 acres
2 = 50 to 500 acres
3 = >500 acres

A-39. Predominant Land Use Within the Drainage Area: 3
(Select one.)

1 = Residential or Industrial
2 = Cultivated land
3 = Pasture, Range land, Parks (with good grass cover)
4 = Woods and Forests

TABLE A-3

FACILITY SCORING INFORMATION - SWMU INFORMATION - DATA ENTRY

Sheet 3 of 5

A-28. Name of SWMU: Surface Impoundment (TX05)

A-40. Accessibility to the SWMU area:
(for off-site population)

1 = Inaccessible
2 = Limited access
3 = Unlimited access

THE QUESTIONS A-41 TO A-50 SHOULD BE ANSWERED FOR EACH SWMU UNIT IF THE FACILITY IS LARGE (GREATER THAN 500 ACRES). FOR SMALL FACILITIES, ANSWER THE FOLLOWING QUESTIONS ONLY ONCE.

A-41. Distance to nearest active drinking water well:
(Select one.)

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 3 miles
4 = >3 miles

A-42. Distance to Surface Water:
(Select one.)

1 = <1/4 mile
2 = 1/4 to 1 mile
3 = >1 to 2 miles
4 = >2 miles

A-43. Distance to nearest surface water intake or contact point:
(Select one.)

1 = <1/2 mile
2 = 1/2 to 1 mile
3 = >1 to 2 miles
4 = >2 to 3 miles
5 = >3 miles

A-44. Surface water use within 3 miles:
(Select lowest possible number.)

1 = Drinking
2 = Fishery
3 = Agriculture or Livestock
4 = Commercial Food Preparation
5 = Recreational
6 = Commercial or Industrial (other than food preparation)
7 = Not used or unusable

HZ/RC/TEV

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: Central Records Files (MC - 199) **Date:** August 16, 2007

Firestone Polymers LLC
5713 FM 1006, Orange, Texas
Solid Waste Registration No. 30581

Thru: Ada Lichaa, Supervisor
Team II, Environmental Cleanup Section I, Remediation Division

From: Mark Arthur, Project Manager
Team II, Environmental Cleanup Section I, Remediation Division

EV received 8/17/07

CA-400

Subject: Documentation of achievement of facility-wide remedy selection complete
EPA ID No. TXD008073538
Agreed Order Docket No. 94-0134-SWR-E

Based on a file review, **remedies have been selected for all units and areas of concern (AOCs) subject to RCRA/HSWA corrective action at the above-referenced facility**. The RCRA milestone of facility-wide Remedy Decision (CA400)[1] has been achieved, based on the approval of the proposed Risk Reduction Standard 3 remedy at 15 waste management areas, on March 7, 2007. A list of all referenced units is attached. Remedies had previously been selected for all other units and AOCs subject to corrective action at the facility.

To date, no additional units subject to corrective action requirements have been identified at the facility.

cc: Waste Program Manager, TCEQ Region 10, Beaumont

Enclosure

Kathleen Hartnett White, *Chairman*
Larry R. Soward, *Commissioner*
Martin A. Hubert, *Commissioner*
Glenn Shankle, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 7, 2007

Ms. Jane Johnson
Bridgestone Americas Holdings, Inc.
535 Marriott Drive
Nashville, TN 37214

Re: Notice to Proceed with Additional Capping of Waste Management Areas; Interim LTM Program Status Report Dated June 2006; Firestone Polymers, LLC, Orange Texas Facility; TCEQ SWR No. 30581; TCEQ Enforcement ID No. 1155; TCEQ Agreed Order Docket No. 94-0134-SWR-E; EPA ID No. TXD008073538

Dear Ms. Johnson:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced Interim LTM Program Status Report (Report). The Report summarized the site-wide groundwater monitoring results from December 2004 to August 2005 and the cap evaluation of the waste management areas (WMAs).

Regarding the cap evaluation, the TCEQ approves the proposed additional capping of the WMAs. At this time, please proceed with the additional capping and then submit a closure completion report documenting all the WMA closures under Risk Reduction Standard 3 as identified in the annotated Table 1 enclosed with this letter.

Please submit your closure completion report within 180 days of the date of this letter. An original and one copy of your report should be submitted to me at the letterhead address using mail code MC-127. An additional copy should be submitted to the Waste Program Manager of the TCEQ Region 10 Office in Beaumont.

Should you need additional information, or wish to discuss the due date, please call me at (512) 239-2362. Thank you for your cooperation in this matter.

Sincerely,

Mark Arthur, P.G., Project Manager
Team II, Environmental Cleanup Section I
Remediation Division

cc: Mr. Norman Kennel, Premier Environmental Services, Inc.
Waste Program Manager, TCEQ Region 10, Beaumont

Enclosure

Table 1. Waste Management Area Summary

WMA ID	Waste Management Area Description	Waste Managed in Area	WMA Closure RRS
TX01	Surface Impoundment	Sludges from API separator, cooling towers, and process drains (copper and chromium)	3
TX02	Landfill	Polybutadiene polymer	3
TX03	Incinerator	Butyllithium catalyst and hexane	1
TX04	Landfill	Pelletized Dow Catalyst (calcium, nickel, and phosphate)	3
TX05	Surface Impoundment	Process wastewater (cuprous ammonium acetate and copper)	2
TX06	Surface Impoundment	Raw water clarification sludge	2
TX07	Surface Impoundment	Cooling tower blowdown, cooling tower solids, and process streams	3
TX09	Landfill	Spent activated carbon	3
TX10	Surface Impoundment	Clarification sludge and cooling tower sand filter solids	3
TX13	Concrete Sump	Caustic and acidic wastewaters	1
TX15	Dumpster Storage Area	Spent activated carbon and copper sludges	3
TX16	Concrete Pits	Process wastewater (cuprous ammonium acetate and copper)	3
TX18	Aboveground Storage Tank	Hexane drawdown; waste oil	3
TX25	Process Area 20C	Elemental mercury catalyst	3
TX28	Cooling Tower Basin	Cooling tower water and sludge (chromium and zinc)	2
TX29	Cooling Tower Basin	Cooling tower water and sludge	2
TX30	Cooling Tower Basin	Cooling tower water and sludge	2
TX31	Cooling Tower Basin	Cooling tower water and sludge	1
TX34	Surface Impoundment	Caustic waste streams	3
F37	Landfill	Dow catalyst (calcium, nickel, and phosphate and chromium)	3
F42	Sludge Deposition Area	Raw water clarification sludge	3
F43	General Dump Area	Miscellaneous waste and plant refuse	3
F46	Disposal Trench	Spent hydrochloric acid	Deferred
F47	Landfill	Miscellaneous plant waste	Deferred
F48	API Separator	Wastewater	3
F49	Tilted Plate Separator	Process wastewater (oil separation)	Active Unit

Notes: 1. Risk Reduction Standard (RRS) 3 closures (except WMA F43) include physical controls, institutional controls, and post-closure care;
2. WMA F43 closure includes only institutional controls; and
3. WMAs F46 and F47 closures deferred until Tank Farm closes. Until then the exposure risk will be managed by institutional controls and facility communication plan.

HZ/RC/TE

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: Central Records Files (MC - 199) **Date:** August 16, 2007

Firestone Polymers LLC
5713 FM 1006, Orange, Texas
Solid Waste Registration No. 30581

Thru: Ada Lichaa, Supervisor
Team II, Environmental Cleanup Section I, Remediation Division

From: Mark Arthur, Project Manager
Team II, Environmental Cleanup Section I, Remediation Division

EW printed 8/17/07

Subject: Documentation of achievement of facility-wide remedy selection complete
EPA ID No. TXD008073538
Agreed Order Docket No. 94-0134-SWR-E

Based on a file review, **remedies have been selected for all units and areas of concern (AOCs) subject to RCRA/HSWA corrective action at the above-referenced facility.** The RCRA milestone of facility-wide Remedy Decision (CA400)[1] has been achieved, based on the approval of the proposed Risk Reduction Standard 3 remedy at 15 waste management areas, on March 7, 2007. A list of all referenced units is attached. Remedies had previously been selected for all other units and AOCs subject to corrective action at the facility.

To date, no additional units subject to corrective action requirements have been identified at the facility.

cc: Waste Program Manager, TCEQ Region 10, Beaumont

Enclosure

Kathleen Hartnett White, *Chairman*
Larry R. Soward, *Commissioner*
Martin A. Hubert, *Commissioner*
Glenn Shankle, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 7, 2007

Ms. Jane Johnson
Bridgestone Americas Holdings, Inc.
535 Marriott Drive
Nashville, TN 37214

Re: Notice to Proceed with Additional Capping of Waste Management Areas; Interim LTM Program Status Report Dated June 2006; Firestone Polymers, LLC, Orange Texas Facility; TCEQ SWR No. 30581; TCEQ Enforcement ID No. 1155; TCEQ Agreed Order Docket No. 94-0134-SWR-E; EPA ID No. TXD008073538

Dear Ms. Johnson:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced Interim LTM Program Status Report (Report). The Report summarized the site-wide groundwater monitoring results from December 2004 to August 2005 and the cap evaluation of the waste management areas (WMAs).

Regarding the cap evaluation, the TCEQ approves the proposed additional capping of the WMAs. At this time, please proceed with the additional capping and then submit a closure completion report documenting all the WMA closures under Risk Reduction Standard 3 as identified in the annotated Table 1 enclosed with this letter.

Please submit your closure completion report within 180 days of the date of this letter. An original and one copy of your report should be submitted to me at the letterhead address using mail code MC-127. An additional copy should be submitted to the Waste Program Manager of the TCEQ Region 10 Office in Beaumont.

Should you need additional information, or wish to discuss the due date, please call me at (512) 239-2362. Thank you for your cooperation in this matter.

Sincerely,

Mark Arthur, P.G., Project Manager
Team II, Environmental Cleanup Section I
Remediation Division

cc: Mr. Norman Kennel, Premier Environmental Services, Inc.
Waste Program Manager, TCEQ Region 10, Beaumont

Enclosure

Table 1. Waste Management Area Summary

WMA ID	Waste Management Area Description	Waste Managed in Area	WMA Closure RRS
TX01	Surface Impoundment	Sludges from API separator, cooling towers, and process drains (copper and chromium)	3
TX02	Landfill	Polybutadiene polymer	3
TX03	Incinerator	Butyllithium catalyst and hexane	1
TX04	Landfill	Pelletized Dow Catalyst (calcium, nickel, and phosphate)	3
TX05	Surface Impoundment	Process wastewater (cuprous ammonium acetate and copper)	2
TX06	Surface Impoundment	Raw water clarification sludge	2
TX07	Surface Impoundment	Cooling tower blowdown, cooling tower solids, and process streams	3
TX09	Landfill	Spent activated carbon	3
TX10	Surface Impoundment	Clarification sludge and cooling tower sand filter solids	3
TX13	Concrete Sump	Caustic and acidic wastewaters	1
TX15	Dumpster Storage Area	Spent activated carbon and copper sludges	3
TX16	Concrete Pits	Process wastewater (cuprous ammonium acetate and copper)	3
TX18	Aboveground Storage Tank	Hexane drawdown; waste oil	3
TX25	Process Area 20C	Elemental mercury catalyst	3
TX28	Cooling Tower Basin	Cooling tower water and sludge (chromium and zinc)	2
TX29	Cooling Tower Basin	Cooling tower water and sludge	2
TX30	Cooling Tower Basin	Cooling tower water and sludge	2
TX31	Cooling Tower Basin	Cooling tower water and sludge	1
TX34	Surface Impoundment	Caustic waste streams	3
F37	Landfill	Dow catalyst (calcium, nickel, and phosphate and chromium)	3
F42	Sludge Deposition Area	Raw water clarification sludge	3
F43	General Dump Area	Miscellaneous waste and plant refuse	3
F46	Disposal Trench	Spent hydrochloric acid	Deferred
F47	Landfill	Miscellaneous plant waste	Deferred
F48	API Separator	Wastewater	3
F49	Tilted Plate Separator	Process wastewater (oil separation)	Active Unit

Notes: 1. Risk Reduction Standard (RRS) 3 closures (except WMA F43) include physical controls, institutional controls, and post-closure care;
2. WMA F43 closure includes only institutional controls; and
3. WMAs F46 and F47 closures deferred until Tank Farm closes. Until then the exposure risk will be managed by institutional controls and facility communication plan.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

November 13, 2000

FIRESTONE POLYMERS
PO BOX 1269
ORANGE, TX 77630
ATTN: HAROLD YARNOLD, ENV COORD

This is to acknowledge that, in compliance with Section 3010 of the Resource Conservation and Recovery Act (RCRA), you have filed a Notification of Regulated Waste Activity for:

FIRESTONE POLYMERS
5713 FARM ROAD 1006
ORANGE, TX 77630

Your EPA Identification Number for this installation is: **TXD008073538**

The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Bienniel Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage, and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste reports and documents required under Subtitle C of RCRA. A Subsequent Notification of Regulated Waste Activity is requested should any information on the original document change.

Charles Faultry, Chief
RCRA Information Management Section

6PD-1

Firestone
Polymers

P. O. Box 1269, FM. 1006
Orange, TX 77630
Phone: 409-886-3601
A division of Bridgestone/Firestone, Inc.

March 15, 2000

United States Environmental Protection Agency
Hazardous Waste Management Division
First Interstate Bank Tower
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RE: Notification of Regulated Waste Activity
EPA ID: TXD008073538

Dear Sir:

An update of EPA Form 8700-12 (Notification of Regulated Waste Activity) for the Firestone, Orange, Texas facility is enclosed.

If there are any questions, please contact H. Yarnold at (409) 883-1758.

Sincerely,

Harold Yarnold

Harold Yarnold
Environmental Coordinator

HY:cb

bcc: E. M. Pace
R. K. Richmond
R. B. Echols

00 MAR 21 PM 3:23
RECEIVED
TEXAS SECTION
MULTIMEDIA/SOLID WASTE ENF BR

30581

Please print or type with ELITE type (12 characters per inch) in the unshaded areas of

Form Approved. OMB No. 2050-0028 Expires 10/31/99
SA No. 0246-EPA-OT

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

RECEIVED
OCT - 5 2000

Date Received (For Official Use Only)

→ To state

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

[ ] A. Initial Notification [X] B. Subsequent Notification (Complete item C)

C. Installation's EPA ID Number: TXD008073538

II. Name of Installation (include company and specific site name)

FIRESTONE POLYMERS

Oct. 14 2000

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: 5713 FARM ROAD 1006

Street (Continued):

City or Town: ORANGE

State: TX

Zip Code: 77630-

County Code: 361

County Name: ORANGE

bb 10/13/00 #5099

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box: PO BOX 1269

City or Town: ORANGE

State: TX

Zip Code: 77630-

10-12-00

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last): YARNOLD

(First): HAROLD

Job Title: ENV. COORDITNATO

Phone Number (Area Code and Number): 409-883-1758

VI. Installation Contact Address (See instructions)

A. Contact Address: Location [X] Mailing [ ]

B. Street or P.O. Box:

City or Town:

State:

Zip Code:

OCT 10 2000

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner: BRIDGESTONE/FIRESTONE, INC.

Street, P.O. Box, or Route Number: 1 BRIDGESTONE PARK

City or Town: NASHVILLE

State: TN

Zip Code: 37214-

Phone Number (Area Code and Number): 615-391-0088

B. Land Type: P

C. Owner Type: P

D. Change of Owner Indicator: Yes [X] No [ ]

(Date Changed) Month: 08 Day: 01 Year: 89

305581

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only.

Form Approved. OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

Please refer to Section V, Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

RECEIVED
OCT - 5 2000
INFORMATION

Date Received (For Official Use Only)

→ To state

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

[ ] A. Initial Notification [X] B. Subsequent Notification (Complete item C)

C. Installation's EPA ID Number: TXD008073538

II. Name of Installation (Include company and specific site name)

FIRESTONE POLYMERS

Oct. 19 2000

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: 5713 FARM ROAD 1006

Street (Continued):

City or Town: ORANGE

State: TX

Zip Code: 77630-

County Code: 361

County Name: ORANGE

bb 10/13/00 #5099

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box: PO BOX 1269

City or Town: ORANGE

State: TX

Zip Code: 77630-

10-23-00

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last): YARNOLD

(First): HAROLD

Job Title: ENV. COORDITNATO

Phone Number (Area Code and Number): 409-883-1758

VI. Installation Contact Address (See Instructions)

A. Contact Address: Location [X] Mailing [ ]

B. Street or P.O. Box:

City or Town:

State:

Zip Code:

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner: BRIDGESTONE/FIRESTONE, INC.

Street, P.O. Box, or Route Number: 1 BRIDGESTONE PARK

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Zip Code: 37214-

Phone Number (Area Code and Number): 615-391-0088

B. Land Type: P

C. Owner Type: P

D. Change of Owner Indicator: Yes [X] No [ ]

(Date Changed) Month: 08 Day: 01 Year: 89

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [X] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220-2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [ ] 3. Highway
- [ ] 4. Water
- [ ] 5. Other - specify _____

3. [ ] Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity, see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Boiler and/or Industrial Furnace
     - [ ] 1. Smelter Deferral
     - [ ] 2. Small Quantity Exemption

Indicate Type of Combustion Device(s)
- [ ] 1. Utility Boiler
- [ ] 2. Industrial Boiler
- [ ] 3. Industrial Furnace

5. [ ] Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
   - [ ] a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
   - [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
   - [ ] a. Utility Boiler
   - [ ] b. Industrial Boiler
   - [ ] c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
   - a. Transporter
   - b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
   - [ ] a. Process
   - [ ] b. Re-refine

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))			
X	X	X	X	D006	D008	D009	D022

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
F005	U208				
7	8	9	10	11	12

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
	E. M. PACE - PLANT MANAGER	3/16/2000

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*